

UNITED STATES DEPARTMENT OF JUSTICE  
OFFICE OF THE UNITED STATES TRUSTEE  
ANDREW R. VARA

UNITED STATES TRUSTEE, REGIONS 3 & 9

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UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

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In re:	:	Case No. 20-23145 (CMG)
	:	Chapter 7
Gerard Skelton,	:	The Honorable Christine M. Gravelle
Debtor.	:	
	:	

**APPLICATION FOR THE ENTRY OF A CONSENT ORDER EXTENDING TIME TO  
FILE A MOTION TO DISMISS CASE UNDER 11 U.S.C. § 707(b)(1) AND (3) AND  
EXTENDING TIME TO FILE A COMPLAINT OBJECTING TO DISCHARGE UNDER  
11 U.S.C. § 727 TO JULY 2, 2021**

The United States Trustee, by and through counsel, in furtherance of his duties and responsibilities under 28 U.S.C. § 586 (a)(3) and (5), hereby respectfully submits this Application for the entry of the Consent Order Extending Time to File a Motion to Dismiss Case Under 11 U.S.C. § 707(b)(1) and (3) and Extending Time to File a Complaint Objecting to Discharge Under 11 U.S.C. § 727 to July 2, 2021.

In support of this Application, the United States Trustee (“U.S. Trustee”) respectfully represents as follows:

1. On November 30, 2020, Gerard Skelton (“Debtor”) filed a voluntary petition for relief under chapter 7 of title 11 of the United States Code.
2. On December 1, 2020, Karen E. Bezner, Esq., was appointed as the chapter 7 trustee.

The meeting of creditors pursuant to 11 U.S.C. § 341(a) was scheduled for and held on December 29, 2020.

3. The deadline to oppose discharge or dischargeability was initially set for March 1, 2021.

4. An independent review conducted by the U.S. Trustee of the Debtor's Petition, Schedules, Statement of Financial Affairs, and Means Test identified this case as a possible candidate for dismissal pursuant to U.S.C. § 707(b)(1) and (3) or objection to discharge under 11 U.S.C. § 727 regarding the Debtor's income, expenses, and unsecured debt.

5. On December 21, 2020, the Debtor filed an Amended Schedules A/B.

6. On March 1, 2021, the U.S. Trustee, by and through counsel, filed a motion to extend the time to file a motion to dismiss for abuse under 11 U.S.C. § 707(b)(1) and (3) and to extend the time to file a complaint objecting to discharge under 11 U.S.C. § 727 to April 30, 2021, which was granted by Order entered on April 6, 2021.

7. The U.S. Trustee, by and through counsel, has been in communication with Debtor's counsel regarding verification of the Debtor's income, expenses, and nature of his unsecured debt.

8. Accordingly, the U.S. Trustee and Debtor's counsel have consented to further extend the time to file a motion to dismiss for abuse under 11 U.S.C. § 707(b)(1) and (3) and to extend the time to file a complaint objecting to discharge under 11 U.S.C. § 727 for approximately 60 days to **July 2, 2021**.

9. Accordingly, the U.S. Trustee requests the entry of the attached proposed consent order as discovery is ongoing in this matter.

Respectfully submitted,  
ANDREW R. VARA  
UNITED STATES TRUSTEE  
REGIONS 3 & 9

By: /s/Michael A. Artis  
Michael A. Artis  
Trial Attorney

DATED: April 30, 2021